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12 [Additional Counsel Appear On Signature Page]

13 UNITED STATES DISTRICT COURT FOR THE
14 EASTERN DISTRICT OF WASHINGTON

15 ROBERT and DANELLE BLANGERES,
16 individually and on behalf of all others
17 similarly situated,

18 Plaintiffs,

19 v.

20 UNITED STATES SEAMLESS, INC.,
21 and KAYCAN LIMITED,

22 Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
PRO HAC VICE**

23 Brendan S. Thompson (the “Applicant”) hereby moves the Court to enter
24 an order permitting him to participate in this case *Pro Hac Vice* as counsel for
25 Plaintiffs Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule
26 83.2(c). In support of this Motion, the Applicant states as follows:

1 1. The Applicant is an associate at the law firm of Cuneo Gilbert &
2 LaDuca, LLP, in Bethesda, Maryland.

3 2. The Applicant is a member in good standing of the bars of several
4 United States federal courts, the highest state court of Maryland.
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6 3. The Applicant does not reside in the State of Washington and does
7 not maintain an office in the State of Washington.
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9 4. The Applicant responds to the information requested in Local Rule
10 83.2(c)(2) as follows:

11 (a) The Applicant's address and telephone number are 8120
12 Woodmont Avenue, Suite 810, Bethesda, Maryland, 20814; telephone
13 (202) 789-3960; facsimile (202) 789-1813; email: brendant@cuneolaw.com.
14

15 (b) The dates of admission to practice before other courts are
16 listed below:
17

18 State Bar Admissions

Date Admitted

19 Maryland

December 18, 2008

21 Federal Bar Admissions

Date Admitted

22 District of Maryland

July 1, 2013

District of Colorado

February 9, 2009

Central District of Illinois

June 8, 2009

Ninth Circuit Court of Appeals

November 30, 2011

(c) The name, address and telephone number of admitted counsel with whom the Applicant will be associated are: Beth E. Terrell and Erika L. Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite 400, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206) 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.

(d) The Applicant's appearance is necessary because Plaintiffs in this action have retained him in this action.

(e) There are no disciplinary sanction actions pending against the Applicant and the Applicant has never been subject to any disciplinary sanctions by any court or Bar Association.

5. The Applicant understands that if he is admitted *Pro Hac Vice* he will be subject to the disciplinary jurisdiction of this Court.

6. The Applicant is familiar with the facts, issues and documents associated with this case.

7. The Applicant is familiar with the local rules of this Court.

1 WHEREFORE, Brendan S. Thompson respectfully requests that the Court
2 enter an order in the form proposed granting the admission *Pro Hac Vice* of
3 Brendan S. Thompson during the pendency of this case.
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5 I declare under penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct.

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8 Dated: August 26, 2013 Brendan Thompson
9 Brendan S. Thompson, Applicant
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STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Brendan S. Thompson is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 28th day of August, 2013.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 28, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 28th day of August, 2013.

2
3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

5 By: /s/ Beth E. Terrell, WSBA #26759

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14 *Attorneys for Plaintiff*